

MEEKER HIGH SCHOOL
MEEKER SCHOOL DISTRICT RE-1
P. O. Box 1089
550 SCHOOL ST.
MEEKER, COLORADO 81641

January 14, 2015

Dear members of the FCC:

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 via Electronic Filing

Dear Chairman Wheeler, Commissioners Clyburn, Rosenworcel, Pai, O'Rielly and Ms. Dortch:

On behalf of Meeker High School, Meeker School District Re-1, and the Meeker Arts and Cultural Council, located in Meeker, Colorado, we write with concern about protection for our wireless microphones and backstage communications devices. The School District serves a small rural agricultural and tourism based community. Schools are desperately underfunded and have no flexibility for added expenditures imposed upon them by such mandates. We are a member of the Educational Theatre Association (EdTA), the national voice of theatre education that includes more than 5,000 educators and 90,000 student members. The mission of EdTA is to provide theatre education opportunities for all students.

Meeker High School, the Meeker Arts and Cultural Council in cooperation with the Eastern Rio Blanco Metropolitan Recreation District Center Stage Youth Theatrical Group and various community performing arts organizations presents more than ten public performances a year, with more than 4000 attendees annually. Our school theatre program relies on the revenue generated in these performances to sustain and grow our in- and after-school theatre education opportunities that benefit all of our 600+ students, as well as the thousands of local community members who are able to enjoy such performances. Wireless microphones are a fundamental aspect of our program, and understanding how to use them is a critical component of our educational pedagogy, both for student performers and technicians.

We understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. We have also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. **This would leave our schools and thousands of others without any interference protection mechanism from the many TV Band Devices that may soon flood the market.**

Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you are unaware of them.

Thousands of performances are held by both educational and professional performing arts organizations each year and the use of wireless microphones is essential to producing high-quality performances and also mitigates against significant public safety concerns.

Per the FCC's request for Public Comment, here are the details about our school's use of wireless devices:

[The FCC is seeking the following information from performing arts organizations and educational institutions; answer as many questions as you can, with accuracy and insert the information here in narrative/bullet form]:

- ☐ **What type of wireless devices do you use?**
 - ☐ *microphones*
 - ☐ in-ear communications (IFBs) *[potential future use with theatre renovations]*
 - ☐ cue and control devices *[potential future use with theatre renovations]*
 - ☐ equipment controlling devices (not transmitting sound)
 - ☐ *[potential future use with theatre renovations]*
- ☐ **How many units do you use in a typical presentation or performance?** 12
 - ☐ [expanded microphone potential future use with theatre renovations]
- ☐ **How frequently do you offer presentations that use wireless devices?**
 - ☐ *~ Ten productions and multiple attendant rehearsals for each production per year.*
- ☐ **What bands and channels do you use?**
 - ☐ *Low UHF (channels 14-36, 470 to 608 MHz) Shure SLX-14 wireless system*
- ☐ **Are your microphones able to tune to more than one frequency?**
 - ☐ *yes*
- ☐ **How wide is their tuning ability?**
 - ☐ *Some of the low UHF wireless microphone band channels*
- ☐ **Which of your devices are outside the TV bands**
 - ☐ *none*
- ☐ **Which of your wireless devices are analog and which are digital?**
 - ☐ *all analog*
- ☐ **Do you own or rent your wireless equipment?**
 - ☐ *own*
- ☐ **For equipment that you own, what is its reasonable life expectancy?**
 - ☐ *ten+ years depending on technology advances and spectrum efficacy and technology.*
- ☐ **How did you handle the move out of the 700 MHz band?**
 - ☐ *No move required as channels were in low uhf band below 700 mHz.*
- ☐ **How long did it take for you to retune or replace all of your devices?**
 - ☐ *n/a*
- ☐ **What can the FCC do to ensure that wireless microphone users transition to new, more efficient devices to the full extent possible?**
 - ☐ *Full compensation for the replacement expense [as well as guaranteeing that the quality of the new devices would meet or exceed performance standards of existing devices.]*
- ☐ **What would persuade you to move out of the TV band?**
 - ☐ *Only full compensation for the cost of transition with equivalent replacement technology fully guaranteed by the FCC. Trade-ins to wireless microphone manufacturers are not an option as the bulk of the replacement technology cost must be borne by the school district which is already in dire financial straits. This cost burden should be borne exclusively by*

the commercial wireless device manufacturers that are consuming vast amounts of the very limited spectrum in order to further enrich their wealth.

We appreciate that the Commission has sought comment on these very important issues. We realize that the FCC is seeking a fair and reasonable solution to the TV band issues we are now facing, but that solution should allow *all* organizations—big and small, professional and educational—adequate and permanent RF interference protection.

The currently proposed plan offers no such protection for many of us. Further, We would request that the Commission consider the burden already borne by the educational and performing arts community in vacating the 700 MHz band when many performing arts organizations were forced to vacate those channels and purchase new technology in other bands at no small expense and without any reimbursement or subsidy from the FCC or from the manufacturers who are taking over that spectrum. We are concerned about the cost of once again being faced with the possibility of a large expenditure required for replacing our school's sound equipment.

Theatre education programs are cornerstones of many schools cultural identity, nurturing 21st-century skills and knowledge for students pursuing performing arts careers, providing pride, entertainment, and dialogue in the communities, and contribute to sustain the local economies. We respectfully request that the Commission maintain and oversee access to interference protection and establish a mechanism to fully reimburse educational and performing arts organizations for the cost of new equipment that may be prompted or required by any proposed spectrum reallocation that compels moving to alternative RF spectrum and/or the commensurate purchase of new technology.

Moreover, the FCC is charged with fair and equitable guardianship and allocation of finite RF spectrums which may only support a certain amount of shared use by a vast plethora of digital wireless devices. This inevitable spectrum overloading may result in harmful interference resulting from increased spectrum saturation and resulting shared use.

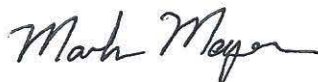
There seems to be a trend to broker seemingly unlimited amounts of the RF spectrum which is the property of the Citizens of the United States to commercial providers, which in turn primarily benefits wealthy corporations. This process may directly impact the right to use RF spectrum by educational institutions and performing arts entities who have very limited funding and cannot afford to constantly be adversely affected by wholesale auctioning of scarce RF spectrum. Exponentially increasing numbers of wireless digital devices are sold by commercial entities for profit and at the expense of inadequately-funded educational and performing arts institutions.

There must be a balance and a guarantee of continued and expandable available RF spectrum for educational purposes such as wireless devices used for performing arts without ongoing fear of being continually impacted by such commercial entities which are continually expanding use of vast amounts of scarce and finite RF spectrum. Thanks very much for your consideration.

Sincerely,



Kim Ibach, Ph.D.
Principal,
Meeker High School



Mark Meyer
Superintendent,
Meeker School District Re-1



Robert D. Amick
Technical Director, MHS Drama
Club and
Troupe Director, International
Thespian Society Troupe 1284;
Board of Directors
Meeker Arts and Cultural Council